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THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JAVIER TAPIA,

Plaintiff,

v.

NAPHCARE, INC., and PIERCE COUNTY,

Defendants.

No. 2:22-cv-01141-JCC

**STIPULATED MOTION AND  
[PROPOSED] ORDER  
EXTENDING TIME FOR  
DEFENDANTS TO MOVE, PLEAD,  
OR OTHERWISE RESPOND TO  
TAPIA’S COMPLAINT AND  
PIERCE COUNTY’S  
CROSSCLAIM BY 14 DAYS**

Pursuant to Local Civil Rules 7(j) and 10(g), Plaintiff Javier Tapia (“Plaintiff”) and Defendants NaphCare, Inc. (“NaphCare”) and Pierce County hereby submit this stipulated motion to extend NaphCare’s time to move, plead, or otherwise respond to Plaintiff’s Second Amended Complaint (“SAC”) and Pierce County’s Crossclaim by 14 days to July 11, 2023.

WHEREAS, on May 23, 2023, the Court issued its Order granting in part and denying in part NaphCare’s Motion to Dismiss. *See* Dkt. No. 31.

WHEREAS, on June 5, 2023, NaphCare filed a Motion for Partial Reconsideration (the “Motion”). *See* Dkt. No. 35.

WHEREAS, on June 6, 2023, Pierce County filed an answer to the SAC and a Crossclaim against NaphCare. *See* Dkt. No. 37.

STIPULATED MOTION AND [PROPOSED] ORDER  
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1 WHEREAS, pursuant to Local Civil Rule 12(a)(1), the deadline for NaphCare to respond  
2 to the SAC is June 27, 2023.

3 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(B), the deadline for  
4 NaphCare to respond to Pierce County's Crossclaim is June 27, 2023.

5 WHEREAS, good cause exists to extend Defendants' deadline to answer or otherwise  
6 respond to Plaintiff's SAC and Pierce County's Crossclaim by 14 days so that the parties and the  
7 Court can have additional time to resolve the Motion before filing additional pleadings.

8 WHEREAS, this stipulated motion is filed in good faith and not for the purposes of  
9 delay, and will not alter any other dates or schedules previously set by this Court.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among  
11 Defendants and Plaintiff, subject to the Court's approval, that the deadlines for NaphCare to  
12 move, plead, or otherwise respond to Plaintiff's SAC and Pierce County's Crossclaim are  
13 extended by 14 days to July 11, 2023.

14 DATED June 23, 2023

*s/ David A. Perez, WSBA No. 43959*

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20 *Attorneys for Defendant Pierce County*

**[PROPOSED] ORDER**

**IT IS SO ORDERED**

DATED this 23rd day of June 2023.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

John C. Coughenour  
UNITED STATES DISTRICT JUDGE

Presented by:

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